

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION
CASE NO.: 1:22-cv-22171-JEM

MICHAEL FITZGERALD,
individually, and YELANY DE VARONA,
individually,
Plaintiffs,

v.

RONDA MCNAE, individually
Defendants.

/

MOTION TO SEAL

COMES NOW, ATTORNEY NICHELLE LYNN WOMBLE, counsel for Defendant RONDA MCNAE, asks the Court to Seal the following communications and Court Filings by RONDA MCNAE as she is acting without counsel:

1. Email to Court and Motion to Dismiss, Proposed Order to Dismiss, and Exhibits.

According to Ms. McNaes, this was sent to the Court for filing via Courier on March 24, 2025. This motion has since been filed and is Docket Number 329.

2. Email to Court on March 21, 2025, and Defendant's Notice to the Court of Unauthorized Settlement Pressure, Mischaracterization and Motion to Preserve Independent Defense Rights. (Docket Number 325).

These documents and the attached exhibits contain confidential and privileged communication between the Defendant, RONDA MCNAE and Counsel, NICHELLE WOMBLE also they include potential information which could prejudice other related matters not before this court.

Respectfully Submitted,

Dated: March 25, 2025

BY:

NICHELLE WOMBLE, ESQ.
AMETHYST LAW GROUP, LLC
100 South Ashley Drive Suite 600
Tampa, FL 33602
Counsel for Defendant
Telephone No.: 844-482-1239
Florida Bar No.: 1032744
nichelle@amethystlawgroup.com

LOCAL RULE 3.01(g) CERTIFICATION

I hereby certify that I have conferred with opposing counsel via email and counsel does not oppose to this motion.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 25, 2025, a copy of the foregoing has been furnished by CM/ECF to all counsel of record.

Respectfully submitted,

BY

NICHELLE WOMBLE, ESQ.
AMETHYST LAW GROUP, LLC
100 South Ashley Drive Suite 600
Tampa, FL 33602
Counsel for Defendant
Telephone No.: 844-482-1239
Florida Bar No.: 1032744
nichelle@amethystlawgroup.com